

Questions to Consider for an Electronic Waste Management Product Stewardship Model

This document is intended to spur discussion among stakeholders concerning questions that would need to be addressed if CalRecycle were to pursue a product stewardship approach for all electronic waste in California. CalRecycle is not developing an example of a comprehensive electronic waste product stewardship model at this time, but we would like to hear from all stakeholders on these issues. The questions that follow are based on CalRecycle's assessment of the [essential components](#) of an effective product stewardship program.

Program Design

1. What should be included in the product scope?
 - a. Currently covered video display devices plus printers, fax machines, CPUs, keyboards, mice, gaming devices, home entertainment systems?
 - b. All electronic devices? Everything with a plug or logic circuit board?
2. How would manufacturers of electronic devices that are not currently in the CEW system be identified?
3. How should collection targets be established? For example, should there be industry wide targets; individual manufacturer/producer (MFR/PR) targets based on market share; individual MFR/PR targets based on weight of covered devices collected in previous years; other?
4. What should convenience goals look like? Free collection opportunities; minimum number of collection opportunities per capita; specified rural collection?
5. What should the enforcement and oversight priorities be under CalRecycle – financial compliance, goal measurement, final disposition of materials, other? DTSC maintains authority over management of hazardous waste.
6. Could a transition be implemented in a manner that would minimize disruption of existing business operations, local government programs, and consumer collection opportunities? How could we assess the economic impacts of a transition to a full product stewardship approach?

Financing Questions

1. Should the program be based on a consumer fee or cost internalization? If consumer fee, should the fee be on every electronic device, or just selected categories? For example, should there be a separate visible fee on keyboards, mice etc. or on major categories such as computers, printers, monitors, televisions?
2. What should the contracting relationships between the SO (or individual MFR/PRs) and recyclers look like? For example, should the SO contract with a select number of recyclers following a competitive bid or should all approved recyclers be able to contract with the SO?

Environmental Issues

1. What environmental regulatory conditions are unique to California that may create challenges?
2. How can the system promote design for the environment, including ease of dismantling, reduction in toxic materials, re-use, and recycled content?
3. Should minimum materials management standards, including identification of ultimate disposition, be mandated and if so, what standards are appropriate? Should certification be required for recyclers (R2, e-Stewards, or equivalent)?